



DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY FORCES COMMAND
1777 HARDEE AVENUE SW
FORT MCPHERSON GEORGIA 30330-1062

REPLY TO
ATTENTION OF

AFLG-PR

5 October 1998

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Contracting Information Letter (CIL) 99-2

1. This CIL contains information on the following subjects:

a. New Certification Standards for the Purchasing Career Field,

b. Use of Appropriated Funds for Purchase of Business or Calling Cards, etc.,

c. Class Deviation to DFARS 213.203-1,

d. IMPAC Purchase Card issues,

e. Reducing Contract Fund Citations, and

f. Central Recruitment of Army Civilian Training, Education and Development System (ACTEDS) Interns.

2. New Certification Standards for the Purchasing Career Field. The certification standards for the Purchasing Career Field have been re-evaluated and the new standards are provided. In the Defense Acquisition University catalog for Fiscal Year 1998, make the following changes:

a. On page 30, remove the reference to "Procurement Technician" in both the title and the text of the career field description.

b. On page C-29, change the training requirement for PURCHASING - LEVEL 1 to read: CON 101 Fundamentals of Contracting. Change the training requirement for PURCHASING - LEVEL 2 to read: CON 202 Intermediate Contracting. The prerequisite for CON 202 should be CON 101 for the Purchasing Career Field only.

For the Purchasing Career Field, Level 1 is GS-5, Level 2 is GS 6-8, and Level 3 is GS-9 and above. For additional information, call Clyde Thomas at DSN 367-6372.

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3. Use of Appropriated Funds for Purchase of Business or Calling Cards, etc.

a. In accordance with AR 25-30, paragraph 11.11, business cards, calling cards, cards of introduction, greeting cards, or cards by any other name are not authorized for purchase using appropriated funds.

b. Although business cards or calling cards are commonly used in the commercial world as far as the government is concerned, they are inherently personal in nature. The rule on personal expenses and furnishings was stated as follows in 3 Comp. Gen. 433 (1924): "Personal furnishings are not authorized to be purchased under appropriations in the absence of specific provision therefore contained in such appropriations or other acts, if such furnishings are for the personal convenience, comfort, or protection of such employees, or are such as to be reasonably required as part of the usual and necessary equipment for the work on which they are engaged or for which they are employed." Therefore, they are considered a personal expense and not payable from appropriated funds without specific statutory authority. The rule is long-standing and has been applied in a number of decisions.

c. This prohibition also applies to the "printing or engraving of calling or greeting cards at government expense." Only certain military and ROTC recruiters are authorized individual business cards at government expense. For additional information, please call Ms. Nancy Ware at DSN 367-5559.

4. Class Deviation to DFARS 213.203-1(i) - Use of Letter Format in Lieu of DD Form 1155, Order for Supplies or Services (98-DEV-8). Reference memo, SARD-PP, 24 July 1998, SAB (encl 1). Authority is granted to deviate from DFARS 213.203-1(I) to use a letter format in lieu of the DD Form 1155. This applies to preparation/issuance of Blanket Purchase Agreements IAW AL 96-3. For additional information, contact Ms. Nancy Ware at DSN 367-5559.

5. IMPAC Purchase Card Issues.

a. IMPAC Purchase Card Limits - Recently we received a

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question from a field activity requesting to raise monthly limits. The activity had a large requirement, but funding would be available incrementally. The cardholder wanted higher limits to enable him to purchase items as funding became available. This situation raises two concerns: "splitting" and competition. The cardholder's past history showed a tendency to purchase from the same vendor. There is current guidance available on these issues. A memo signed by SARDA in October 1997 says the following: "Instances of cardholder abuse (to include splitting) should be met with clear and decisive actions (to include disciplinary actions by the Approving Official (AO)) against the cardholder. At a minimum, repetitive instances of splitting by a cardholder, or the failure of the AO to take action, shall constitute justification for the local program coordinator to cancel the card." (see CIL 98-4). Additionally, AFARS Appendix DD - Management Control Evaluation Checklist, includes the question, "Are abuses promptly reported to and acted on by the contracting office (e.g. recover abused cards)?" This guidance can be used as a measure of management control.

The cardholder (and Approving Official) should be asked to give convincing evidence that these are not split purchases. If they cannot, the DOC would be acting within its authority not only to refuse to increase limits, but to prevent the cardholder from continuing to use the card based on the purchase history and the apparent failure of the AO to control splitting and sole sourcing these requirements.

b. Audit of Controls over the use of IMPAC (Audit Report: IR-06A801). A report of audit was completed on the use of the IMPAC. The objectives of the audit were to evaluate the adequacy of controls over the IMPAC program to prevent fraud, waste and abuse and determine if the Management Control Program (MCP) as it relates to the IMPAC program was adequately implemented.

Overall controls seemed adequate to prevent fraud, waste and abuse. The IMPAC program is streamlining the procurement process. The audit did not disclose any instances of fraudulent actions. The review did identify that mandatory sources of supplies were not always used, sales tax was paid, and Approving Officials and Activity Program Coordinator reviews needed

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strengthening. Some of the areas requiring improvement are:

- (1) Property accountability for non-expendable items.
- (2) Approving officials' supervisory reviews over cardholder purchases.
- (3) Bulk funding of cards in accordance with DA guidance.
- (4) Segregating requirements in order to remain within authorized dollar limits (split purchases).

Suggested Actions:

- (1) Reemphasize the requirement to use mandatory supply sources and provide a list of vendors available to provide the supplies.
- (2) Reemphasize to cardholders and AOs that IMPAC purchases are sales tax exempt.
- (3) Reemphasize to AOs their responsibility to ensure that non-expendable property is posted to property records and that demand for supply managed items must be reported to the supply system.

c. Change one to OUSD(C) Purchase Card memorandum #3.

- (1) The focus of this change is to implement specific authority obtained from Office of Management and Budget which allows IMPAC card statements to be paid immediately upon certification. Formal correspondence is forthcoming.
- (2) DFAS has already issued policy implementing this change. For the DFAS-IN network, this change is in policy memorandum 98-28, SUBJECT: Payment of Certified Vouchers. A copy of the policy can be found at: <http://www.asafm.army.mil/frame1.htm> through the DFAS policy link.

Section 3 of the OUSD (C) policy refers to automated purchase card management systems. The Army plans to make maximum use of

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the automated tools available under the new purchase card contract. Activities should not expend additional resources implementing any of the purchase card management systems mentioned in this section.

d. Payment for Training. The Deputy Secretary of Defense memorandum, 20 July 1998, subject: Purchase Card Program Reengineering Implementation Memorandum #6: Streamlined Payment Practices (encl 2), directs changes to the payment process for civilian training. Effective October 1, 1998, all commercial civilian training up to and including \$25,000, will be paid for using the government purchase card. Continue to use the DD Form 1556 (or its electronic equivalent), to request, authorize and certify training and to document training agreements. Payment for Government training will be made by inter/intra department fund transfer procedures until next calendar year. This change is designed to save both time and financial resources. Activities should immediately begin acquiring necessary cards and training for card users to achieve this objective. When arranging for commercial training, advise vendors that payments after October 1, 1998 will be made using the government VISA purchase cards. Any vendor with a VISA or Mastercard account will be able to accept purchase card payments. Vendors without a VISA account can contact their local bank or US Bank to establish one.

For additional information, please contact Ms. Gwen Miles at DSN 367-5486.

6. Reducing Contract Fund Citations. Reference memo from the Office of the Secretary of Defense, May 8, 1998, SAB (encl 3). This information was provided in the Procurement Alert Bulletin, 98-007, 12 June 1998. For additional information, please contact Ms. Sandi Bruner at DSN 367-6296.

7. Central Recruitment of Army Civilian Training, Education and Development System (ACTEDS) Interns. Reference memo, SARD-PM, SAB (encl 4). The management of the ACTEDS intern recruitment will now be provided through the North Central Civilian Personnel Operations Center (NC CPOC). As a rule, Career Program 14 interns should enter the program at the GS-7 level and have a target grade of GS-11 after completing the two year program. For

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additional information, please contact Clyde Thomas at DSN 367-6372.



CHARLES J. GUTA
Colonel, AC

Chief, Contracting Division, DSCLOG
Principal Assistant Responsible
for Contracting

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as

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ARMY ATLANTA CONTRACTING CENTER, ATTN: AFLG-PRC



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY
RESEARCH DEVELOPMENT AND ACQUISITION
103 ARMY PENTAGON
WASHINGTON DC 20310-0103

REPLY TO
ATTENTION OF

JUL 24 1998

SARD-PP

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Class Deviation to DFARS 213.203-1(i) - Use of Letter Format in
Lieu of DD Form 1155, Order for Supplies or Services
(98-DEV-8)

Reference Memorandum, SFAE-CSA-PPP, Subject: Acquisition Letter
96-3 - Purchase of Commercial Items Valued Between \$2,500 and \$25,000
Using the IMPAC Purchase Card, 17 Jul 96.

Authority is hereby granted to deviate from DFARS 213.203-1(i) to use a
letter format in lieu of DD Form 1155, Order for Supplies or Services in
preparation and issuance of Blanket Purchase Agreements. Contracting offices
shall follow procedures in AFARS 13.2, Blanket Purchase Agreements, in the
selection and appointment of individuals to place calls against these BPAs. This
deviation has been assigned Army Deviation Control Number 98-DEV-8, which
should be cited in each BPA file. The deviation authority will expire 1 August
2000, unless sooner rescinded or superseded.

Point of contact for this action is Ms. Betty J. Wucher 703-681-1042 or
DSN 761-1042.


John R. Conklin
Director
Procurement & Industrial Base Policy

DISTRIBUTION:

PRINCIPAL ASSISTANTS RESPONSIBLE FOR CONTRACTING
HQ, U.S. Army Materiel Command, ATTN: AMCRDA-AC (PARC),
5001 Eisenhower Avenue, Alexandria, VA 22333-0001

U.S. Army Aviation and Missile Command, ATTN: AMSAM-AC, Redstone
Arsenal, AL 35898-5280

U.S. Army Materiel Command Acquisition Center, ATTN: STEAA-AE, 4118
Susquehanna Avenue, Aberdeen Proving Ground, MD 21010-5002



THE DEPUTY SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301

20 JUL 1998

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARIES OF DEFENSE
DIRECTOR, DEFENSE RESEARCH AND ENGINEERING
ASSISTANT SECRETARIES OF DEFENSE
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE
DIRECTOR, OPERATIONAL TEST AND EVALUATION
ASSISTANTS TO THE SECRETARY OF DEFENSE
DIRECTOR, ADMINISTRATION AND MANAGEMENT
DIRECTORS OF THE DEFENSE AGENCIES
DIRECTORS OF THE DOD FIELD ACTIVITIES
DIRECTOR, DEFENSE MANPOWER DATA CENTER

SUBJECT: Purchase Card Program Reengineering Implementation Memorandum #6:
Streamlined Payment Practices

I have long supported efforts to streamline operations and reduce costs in the Department by implementing the government-wide commercial purchase card for purchases and payments at or below \$2,500.

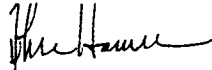
A recent review of Defense Finance and Accounting Service (DFAS) commercial invoice processing data indicates that there are still 4.6 million commercial invoice payments made annually that could be eliminated if the purchase card were used as the payment vehicle. For example, in January 1998 DFAS processed nearly 217,000 payments made on contracting instruments, nearly 83,000 inter-/intra-government payments, over 65,000 miscellaneous payments, and over 17,000 training payments valued at or below \$2,500 that were not on the commercial purchase card. DFAS has estimated that moving these payments to the purchase card could save the Department millions annually--savings that are needed to modernize and maintain our fighting forces.

I recognize that many of you are currently reviewing your business processes to broaden acceptance of the purchase card; however, I believe more must be done. Specifically, I direct the following:

- The Under Secretary of Defense (Personnel and Readiness) shall issue Departmentwide policy by August 15, 1998, directing expedited use of the purchase card as the method of payment for all training requests using the DD Form 1556 valued at or below \$25,000, and all medical services and Nonappropriated Fund payments valued at or below \$2,500 when determined to be appropriate and cost effective.
- The Under Secretary of Defense (Acquisition and Technology) and the Purchase Card Program Management Office (PMO) shall develop Department-wide policy by October 1, 1998, requiring the use of the purchase card to pay for goods and services purchased using standard contracting instruments, such as the Standard Form 1449 and the DD Form 1155, valued at or below \$2,500. This policy shall address contracts, purchase orders, blanket purchase agreements, basic ordering agreements, and orders under task and delivery order contracts. It will also address bills of lading and stock fund transactions. USD(A&T) will also work with the General Services Administration to develop policies that further the use of the purchase card to pay for goods and services available on Federal Supply Schedules.

- The Under Secretary of Defense (Comptroller) will issue Department-wide policy by October 1, 1998, requiring the use of the purchase card for all Military Interdepartmental Purchase Requests (DD Form 448) valued at or below \$2,500.
- Each DoD Component will ensure that the commercial purchase card is used whenever feasible as the payment vehicle for all goods and services valued at or below \$2,500. Components using electronic commerce/electronic data interchange systems that result in a more cost-effective payment process must develop a business case analysis for each system which must be forwarded to me, through the Director, DFAS, by August 31, 1998, for approval. Components must also forward to me, through the Purchase Card PMO, by August 31, 1998, an assessment of any operational requirement that precludes full implementation of the purchase card. You are to provide me a report, through the Director, DFAS and the Purchase Card PMO, by October 1, 1998, of your purchase card program accomplishments.
- The Director, DFAS shall provide a monthly report to the Purchase Card PMO, with copies to me and the Under Secretaries of Defense for Acquisition and Technology, Personnel and Readiness, and Comptroller, of the quantities and sources of commercial invoice payments at or below \$2,500. The reporting will begin no later than October 1, 1998. On a quarterly basis, this report will include an analysis of the payments by type and source. The Director, DFAS in conjunction with the affected DoD Component will conduct 100 percent audits of commercial invoice transactions at up to three installations per Military Department and the Defense Logistics Agency beginning in July 1998.

Until we expand the use of the purchase card, the Department will be unable to achieve the savings projected in the Quadrennial Defense Review and reduce the associated costs of our financial transactions. Therefore, I expect everyone in the Department to support the expedited expansion of the purchase card program. For further information, your staff may contact the Purchase Card Program Manager, Mr. Bruce Sullivan at (703) 681-7564.



John J. Hamre



OFFICE OF THE SECRETARY OF DEFENSE
WASHINGTON, DC 20301



May 8, 1998

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (RESEARCH,
DEVELOPMENT AND ACQUISITION)
ASSISTANT SECRETARY OF THE ARMY (FINANCIAL
MANAGEMENT AND COMPTROLLER)
ASSISTANT SECRETARY OF THE NAVY (RESEARCH,
DEVELOPMENT AND ACQUISITION)
ASSISTANT SECRETARY OF THE NAVY (FINANCIAL
MANAGEMENT AND COMPTROLLER)
ASSISTANT SECRETARY OF THE AIR FORCE (ACQUISITION)
ASSISTANT SECRETARY OF THE AIR FORCE (FINANCIAL
MANAGEMENT AND COMPTROLLER)
DIRECTORS OF THE DEFENSE AGENCIES

SUBJECT: Reducing Contract Fund Citations

The acquisition and financial management communities have worked together in recent years to improve the integrity of the financial management process. A major goal of that effort has been to reduce unmatched disbursements and improve the timeliness and accuracy of contract payments. Additional progress is possible if we can hold the number of contract fund citations to a minimum. Reducing the number of fund citations will result in simpler contracts, fewer opportunities for unmatched disbursements, and less payment prevalidation effort.

In order to hold the number of contract fund citations to a minimum, the establishment of separate contract fund citations within the same congressional funding line shall be limited to situations where it is needed to comply with one of the following requirements:

- Congressionally mandated reporting requirements contained in regulation or congressional committee reports.
- Information specifically required in the "DoD Financial Management Regulation."
- Information specifically required in Program Objective Memoranda or budget guidance signed by the Under Secretary of Defense (Comptroller) (USD(C)), the Principal Deputy Under Secretary of Defense (Comptroller), or the Director, Program Analysis and Evaluation.

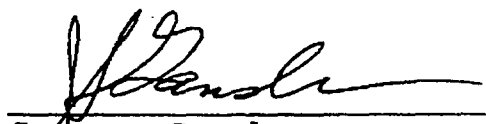


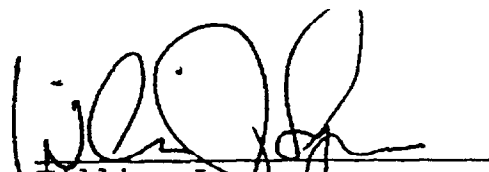
- Information identified in writing by the USD(C) as necessary to prepare the Department's annual audited financial statements.
- Information required by the Office of Management and Budget, Department of Treasury, or other Federal Agency when the requirement is contained in a signed policy directive issued by the applicable agency.

Exceptions for additional separate contract fund citations within the same congressional funding line may be made with the prior written approval of the applicable Assistant Secretary of a Military Department (Financial Management and Comptroller) and Service Acquisition Executive. Written approvals for Defense Agencies may be granted by the Director of a Defense Agency and the Director, Defense Procurement, Office of the Under Secretary of Defense (Acquisition and Technology). This authority shall not be further delegated.

Additionally, we request that the acquisition and financial management communities within each Military Department and Agency work together to examine their financial data needs to determine whether the information being collected is essential, and if so, whether it already is available or otherwise attainable without the need for a separate subdivision of funds within a contract. We note with satisfaction steps taken along these lines by the Commander, Naval Air Systems Command (NAVAIR) and NAVAIR Program Executive Officers in their memorandum of August 19, 1996, which we are providing for your information, and by the Deputy Commander/Comptroller of the Naval Sea Systems Command.

These requirements are effective for contracts entered into on or after October 1, 1998. The point of contact in the Financial Management/Comptroller community is Mr. Nelson Teye, Deputy Chief Financial Officer, (703) 697-0503, and in the Acquisition community is Mrs. Eleanor Spector, Director of Defense Procurement, (703) 695-7145.


 Jacques Gansler
 Under Secretary of Defense
 (Acquisition & Technology)


 William Lynn
 Under Secretary of Defense
 (Comptroller)

Attachment



DEPARTMENT OF THE NAVY
NAVAL AIR SYSTEMS COMMAND
NAVAL AIR SYSTEMS COMMAND HEADQUARTERS
1421 JEFFERSON DAVIS HWY
ARLINGTON VA 22243

IN REPLY REFER TO

3100
Ser AIR-22/CLI
19 Aug 96

JOINT LETTER

From: Commander, Naval Air Systems Command
Program Executive Officer for Tactical Aircraft Programs
Program Executive Officer for Air ASW, Assault and Special
Mission Programs
Program Executive Officer for Cruise Missiles and Joint
Unmanned Aerial Vehicles

Subj: REDUCTION OF LINES OF ACCOUNTING AND CONTRACT LINE
ITEMS IN TEAM CONTRACTS

Ref: (a) DFARS 204.7107
(b) DFARS 204.7103 and 204.7104

1. We are committed to changing business practices that contribute to problem disbursements on TEAM contracts. Many initiatives are under way by the TEAM, Defense Finance and Accounting Services (DFAS) and Defense Contract Management Command to resolve this difficult issue. As the paying agent for TEAM contracts, DFAS believes that the complexity of our contracts contributes to problem disbursements. To remove contract complexity as a possible contributor to problem disbursements, effective immediately, all TEAM program managers, contracting officers and business and financial managers shall minimize the lines of accounting, Accounting Classification Reference Numbers (ACRNs), and Contract Line Item Numbers (CLINs) on TEAM contracts. This policy applies to new contracts, modifications to contracts for new procurement, and direct cite funding documents that will result in contracts.

2. Reference (a) requires a unique ACRN for every unique line of accounting on a contract. A contract shall not cite more than one line of accounting when the fiscal year, appropriation, subhead and project unit are the same. Each Requiring Financial Manager (RFM) shall manage all other financial information for internal budget execution purposes. Effective 01 October 1996, approved deviations will be required prior to issuance of financial accounting data sheets for procurements that deviate from this policy. The cognizant Assistant Program Executive Officer (Contracts) must approve each deviation to this policy. Exceptions to this policy include external customer funds such as Shipbuilding & Conversion Navy (SCN), Foreign Military Sales (FMS), Defense Business Operating Funds (DBOF), and other non-NAVAIR funds. Consulting Services (also known as Contracted Advisory and Assistance Services (CAAS) as defined in FAR 372) are also exempt from this policy due to statutory tracking requirements. Nevertheless, the TEAM shall make every effort

ATTACHMENT

Subj: REDUCTION OF LINES OF ACCOUNTING AND CONTRACT LINE
ITEMS IN TEAM CONTRACTS

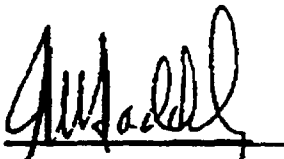
to reduce the use of unique lines of accounting. FMS case managers shall make every effort to develop and implement Letters of Offer and Acceptance in order to reduce lines of accounting.

3. Also, the TEAM must minimize the use of CLINs and Subline Item Numbers (SLINs) with individual prices. Generally, priced CLINs/SLINs shall equal the number of ACRNs, unless the requirements of reference (b) and sound business practices dictate otherwise. Each procurement planning conference shall discuss and include in the planning agreement the CLIN/SLIN and ACRN structure.


4. Another initiative to reduce lines of accounting and priced CLINs/SLINs on TEAM contracts is to limit the use of internal project directives (PDs) which pass funding authority from RFMs to participating managers (PARMs). Further analysis will be conducted on the exceptions to the above policy with the potential result of further restricting or completely eliminating internal PDs.


5. This policy is effective through 30 September 1999.

6. Implementation guidance for this policy, to include training, will be provided in the near future. The point of contact for accounting issues resulting from this policy is AIR-7.6.2, Mr. Gilbert Beckner at (703)604-2288, extension 4332. The point of contact for contracting issues resulting from this policy is AIR-2.1.1, Ms. Kathy Young at (703)604-2005, extension 6126.


J.W. HADDOCK
PEO(A) (Acting)


J. A. COOK
PEO(T)


B. A. STRONG
PEO(CU)


J. A. LOCKARD
COMMANDER

Distribution:
(See page 3)

SARD-PM

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Central Recruitment of Army Civilian Training, Education and Development System (ACTEDS) Interns

Under recent changes approved by the Office of the Assistant Secretary of the Army (Manpower and Reserve Affairs), the management of ACTEDS intern recruitment will be provided through the North Central Civilian Personnel Operations Center (NC CPOC). They will be working closely with the Director, Contracting Career Program Office and the commands in developing a solid recruitment strategy for the Contracting and Acquisition Career Program. The final business process for the new intern recruitment is still under development and we will provide you with relevant information as soon as it is available.

In this regard, our new ACTEDS plan has been approved and will be available shortly. The recruitment effort will include participation in on-campus career days with a focus on outstanding scholars. As a rule, all CP-14 interns should enter at the GS-7 level and have a target grade of GS-11 after completing the two-year program.

The Army is currently planning its recruitment strategy for Fiscal Year 2000. Command Civilian Personnel Directors have been asked to provide the command intern requirements to OASA(M&RA) by September 30, 1998. Major Commands (MACOMs) have responsibility for placing interns upon graduation. As each intern must sign a mobility agreement, there is latitude for placing interns in the first instance anywhere within a MACOM. Failing that, MACOMs will report the intern to HQDA. We will then work together to place interns in vacancies throughout the Army contracting system.

If you have any questions or comments about CP-14 intern requirements, please contact Dr. Jim Edgar (703) 681-1043 or Mr. Steve Hamilton (703) 681-1044.

Kenneth J. Oscar
Functional Chief Representative
Civilian Contracting and Acquisition